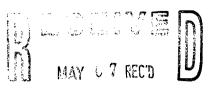


Clean Harbors Recycling Services of Chicago, LLC 1445 West 42nd Street Chicago, IL 60609

773.247.2828
Fax 773.650.1466
www.cleanharbors.com

US EPA RECORDS CENTER REGION 5



Classed OFFICE

Sector La Fritzenics Division

Classed No. 1 (1997)

VIA CERTIFIED MAIL 7005 2570 0000 0264 1586

April 30, 2008

Mr. James Blough Waste Management Branch, DW-8J Waste, Pesticides and Toxics Division United States Environmental Protection Agency, Region 5 77 West Jackson Boulevard Chicago, Illinois 60604-3590

Re:

Clean Harbors Recycling Services of Chicago, LLC (formerly Safety Kleen Systems, Inc.) Closure Certification Report – Tank T-17 ILD #005450697, Permit # 0316000053 - Cook

Dear Mr. Blough:

Enclosed is the closure certification report for Tank T-17 at the Clean Harbors Recycling Services of Chicago, LLC. The Closure Certification Report is being submitted in accordance with Part B Permit, Section II, L.6. A Closure Certification Statement is included in the report in Attachment F.

The report summarizes the activities performed to achieve closure of tank T-17. Closure activities were performed in accordance with the facility permit conditions and closure plan.

If you have any questions concerning this submittal or require additional information, please contact Gary Malinowski at 773-247-2828.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Alfred Aghapour General Manager,

141 Mm

Clean Harbors Recycling Services of Chicago, LLC

Enclosures

cc:

Mark Schollenberger (IEPA) Part B Permit - 2008 – T-17 Closure



April 21, 2008

Mr. Alfred Aghapour Facility Manager – Chicago Recycle Center Clean Harbors Environmental Services 1445 W. 42nd Street Chicago, IL 60609

RE: Tank

Tank T-17 Closure Certification for the Chicago Recycle Center, Clean Harbors Environmental Services, Chicago, Illinois

Dear Mr. Aghapour:

Safety-Kleen Systems, Inc. (S-K) operated the Chicago Recycle Center at 1445 West 42nd Street in Chicago, Illinois until March 2008. S-K operated the Recycle Center in accordance with a Hazardous Waste Permit (ILD 005450697/Permit No. 0316000053) issued by the Illinois Environmental Protection Agency (IEPA). S-K sold the Chicago Recycle Center to Clean Harbors Environmental Corporation on March 21, 2008.

Prior to Clean Harbors purchase of the Chicago Recycle Center, S-K contracted with Trihydro Corporation (Laramie, Wyoming) to document and verify closure of Tank T-17. Trihydro Corporation (Trihydro) recently completed the Tank T-17 closure documentation and verification activities at the Chicago Recycle Center under the direction of a register Illinois Professional Engineer. The results of the Tank T-17 closure activities are being submitted to both S-K and Clean Harbors.

Background

Tank T-17 had been used for management of hazardous waste (PW VOC Strip LTO). S-K cleaned and removed the tank from service in 2004 in order to proceed with repairs on the tank so it could be placed back in service. On February 19, 2007, following a detailed evaluation of the needed repairs, S-K concluded that the tank was beyond repair; therefore, the tank required closure pursuant to 40 CFR 264.197. Site-specific requirements for tank closure are documented in the facility Closure Plan, which was submitted as part of the Part B Permit Application dated May 8, 2002. On August 1, 2007, S-K requested a Class 1 Modification from the IEPA for removal Tank T-17 from the facility permit. A copy of pertinent correspondence related to the closure of Tank T-17 is included as Attachment A.

Previous Tank Closure Activities

Tank T-17 was a 3,500-gallon waste stainless steel cone bottom above ground storage tank. Ancillary equipment for the tank included piping, pumps, valves, filters, and flow meters. Secondary containment for the tank consisted of reinforced concrete floor with perimeter dike walls to prevent migration of incidental spillage. The secondary containment area is sealed with a chemical resistant coating to limit



Mr. Alfred Aghapour April 21, 2008 Page 2

the migration of materials into the concrete. Since Tank T-17 is within a tank farm with other actively utilized tanks, the secondary containment decontamination and closure activities outlined in the May 8, 2002 Closure Plan were not performed at this time.

In September 2004, S-K facility personnel began the clean-out and decontamination process for Tank T-17 in order to prepare the tank for the needed repairs. As required by the Closure Plan, the lines to Tank T-17 were locked out and tagged to prevent the flow of material into and out of the tank. The contents of the tank were removed by S-K personnel on September 19, 2004. This process generated a reported 2,798 gallons of material, which was transferred into another above ground storage tank for subsequent processing through the S-K recycling and waste management system.

Following removal of the contents, S-K personnel pressure washed and rinsed the Tank T-17 on September 20, 2004 and again on September 23, 2004. Reportedly, decontamination was completed for surfaces that waste streams contacted or potentially contacted, including ancillary equipment and the interior of the tank. Washing and rinsing continued until the surfaces appeared visually clean to the extent practicable. Documentation of the 2004 decontamination activities are included in Attachment B. Photographs showing Tank T-17 following the September 2004 pressure washing activities are included in Attachment C.

S-K collected and analyzed a preliminary rinsate sample, according to the GC analytical procedures set forth in the facility Waste Analysis Plan, to determine if additional decontamination was necessary. This sample was analyzed by the onsite S-K laboratory for total organic compounds on September 20, 2004. The Closure Plan, as amended by the Class 1 permit modification, specified decontamination of the tank will continue until the rinsate concentrations are no longer characteristically hazardous and the concentration of total organic constituents is below 10 ppm. Based on the results of the preliminary GC analysis, S-K performed additional pressure washing of Tank T-17 on September 23, 2004. Copies of the S-K Facility Daily Notes regarding the decontamination and sampling activities have been included as Attachment B.

The wash/rinse water from the September 2004 pressure washing activities was collected and processed through the S-K recycling and waste management system.

2008 Tank Inspection and Sampling Procedures

S-K retained Trihydro to verify that Tank T-17 was appropriately decontaminated pursuant to the facility Closure Plan dated May 8, 2002. Jack Bedessem of Trihydro (Illinois Professional Engineer No. 062049091) inspected Tank T-17 on January 17, 2008. One additional tank rinse was conducted by S-K personnel during the January 2008 inspection. Approximately 100 gallons of rinse water were generated during the final rinse of Tank T-17.



Mr. Alfred Aghapour April 21, 2008 Page 3

The secondary containment structure was also inspected on January 17, 2008. Less than one inch of ponded water was observed within the secondary containment area from recent precipitation. No sheen was observed on the ponded water. The secondary containment area consisted of concrete floor and dike walls with gray coating/sealant. No gaps or cracks were observed in the floor or dike walls near Tank T-17. Photographs from the January 2008 inspection of Tank T-17 have been included in Attachment C. Field notes from the January 2008 tank inspection are also in Attachment B.

The modified closure plan submitted in August 2007 as part of a Class 1 permit modification included a requirement for rinsate sampling to verify decontamination. Two samples were collected to verify the rinsate was free from facility-related organic and inorganic constituents. One final rinsate sample (FR-1) was collected after the tank had been re-rinsed. The sample was collected by closing the bottom drain valve to the tank, rinsing the interior tank walls, submerging the clean glass container, and transferring the rinsate water to sample container. One tap water sample (TAP-1) was also collected to determine if the water used for decontamination contained organic or inorganic constituents.

The samples were sealed, labeled, placed on ice in a cooler, and delivered to the TestAmerica Laboratory (University Park, Illinois) for analysis of volatile organic compounds (VOCs) by EPA Method 8260B, semivolatile organic compounds (SVOCs) by EPA Method 8270C, and RCRA metals by EPA Method 6010B and 7470A. One trip blank accompanied the samples and was submitted for analysis of VOCs.

Tank Inspection and Sampling Results

During the January 2008 site visit, Tank T-17 was found to be free of visible signs of oily or hazardous materials, and was also odor free. No residue or solids were noted in the tank. Minor areas of discoloration were noted on the interior walls of the tank. Photographs of the decontaminated tank have been included in Attachment C.

A summary of the analytical results for the tank rinsate sample, tap water sample, and trip blank is presented in Table 1. Three VOCs (bromodichloromethane, chloroform, and dibromochloromethane) were detected at low concentrations in the final rinsate sample (FR-1) and the tap water sample (TAP-1). These constituents are trihalomethanes (THMs), which are commonly present in tap water as disinfection by-products, and not likely associated with the tank contents. As shown in Table 1, the detected concentrations were well below the USEPA MCL for total THMs of 0.1 mg/L. The laboratory analytical report and associated data validation documentation have been included as Attachment D.

Following receipt of laboratory data confirming the decontamination of Tank T-17, S-K contracted with Anchor Mechanical to remove the clean tank from Tank Farm #4. On February 26 and 27, 2008, Anchor Mechanical removed Tank T-17 and cut it up for off-site recycling and management as scrap material.



Mr. Alfred Aghapour April 21, 2008 Page 4

On March 8, 2008, the tank was shipped from the Chicago Recycle Center to United Scrap Metal, Inc. (Cicero, Illinois). Photographs documenting the Tank T-17 removal and scrapping process have been included as Attachment C. A copy of the certificate of destruction from United Scrap Metal, Inc. dated March 10, 2008 has been included as Attachment E.

Closure Certification

Verification and documentation of the closure of the 3,500-gallon Tank T-17 at the former S-K Chicago Recycle Center was completed between January and March 2008. The documentation and verifications activities were performed under the supervision of an Illinois registered Professional Engineer. The field inspections and the results of rinsate samples indicate that closure has been satisfactorily completed in accordance the facility closure plan and modification. A closure certification statement for Tank T-17 is presented in Attachment F.

Trihydro appreciates the opportunity to assist S-K and Clean Harbors with closure of Tank T-17. If you have any questions or require additional information, please do not hesitate to contact us at (307) 745-7474.

George Mathes P.E.

Vice President

Sincerely,

Trihydro Corporation

Jack Bedessem, P.E.

President

083-001-001

Enclosures:

Table 1 – Rinsate Sample Analytical Summary

Attachment A – Pertinent Correspondence

Attachment B - Field Notes

Attachment C - Photodocumentation

Attachment D – Laboratory Analytical Report and Data Validation

Attachment E – Certificate of Destruction

Attachment F - Closure Certification Statement

VIA CERTIFIED MAIL # 7005 2570 0000 0264 0589

August 1, 2007

Mr. Stephan Nightingale, P.E.
Illinois Environmental Protection Agency
Bureau of Land
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Re: Safety-Kleen Systems, Inc. Chicago Recycle Center
Class 1 Modification – Removal of Permitted Unit (Storage Tank T-17)
ILD 005450697, Permit # 0316000053 – Cook County

Dear Mr. Nightingale,

In accordance with 35 IAC Section 703.281(b), Safety-Kleen Systems, Inc. (Safety-Kleen) is notifying the IEPA of a class 1 modification to the State Hazardous Waste Operating Permit (Part-B) issued by the Agency on March 4, 2005. Safety-Kleen requests approval to remove from the Part B Permit the unit identified as Storage Tank T-17 in Section II.B.1. of the Part-B Permit.

Safety-Kleen had anticipated that closure of this tank would occur with the closure of the entire facility. Safety-Kleen has further made the determination that this unit will need to be closed due to the tank being deemed un-fit for hazardous waste service. The tank was evaluated by a registered professional engineer and repair was deemed to be not practical and economical due to the tank needing major repairs due to corrosion. Therefore, Safety-Kleen is requesting approval to close this unit and remove it from the tank farm. Safety Kleen is also requesting that the current permitted capacity of this tank be reserved in the Part-B Permit for a future "replacement in-kind". This request is being submitted in accordance with 35 IAC 703, Appendix A (D)(1)(c). This type of Class 1 modification is identified with an asterisk. Therefore, prior approval from the Agency is required before the modification can be made.

In accordance with 35 Ill. Adm. Code 703.281(a)(2), Safety-Kleen will send a notice to all persons on the facility mailing lists within 90 days after the receipt of approval from the Illinois Environmental Protection Agency.

Safety-Kleen Systems, Inc. Chicago Recycle Center ILD 005450697 August 1, 2007 Page 2 of 6

> Chicago Recycle Center Class 1 Permit Modification (July 2, 2007)

Part B Permit Modifications

As identified in the cover letter to this request, Safety-Kleen Systems, Inc. (Safety-Kleen) will be modifying the permitted tank system in Tank Farm #4 by removing tank T-17.

The modification to the permit is necessary to comply with the standards required for the storage of hazardous waste in a permitted tank system.

Provided below is the applicable information that is required to be submitted in accordance with 35 IAC 703.281(a)(1).

I. 35 IAC 703.181 - Contents of Part A

This section is not impacted by this modification request.

II. 35 IAC 703.182 - Contents of Part B

The tank system T-17 as approved in the Part B Permit on April 8, 2005 will be removed from service and closed in accordance with the closure plan approved in the permit.

The tank system T-17 is a 3500 gallon storage tank used for the storage of liquid hazardous and non-hazardous waste solvents. The tank, its location within Tank Farm #4, and location in the facility are shown in Exhibit(s) #3 and #30 in the facility RCRA Part-B Permit application dated 5/7/2002.

III. 35 IAC 703.183 - General Information

This section is not impacted by this modification request.

IV. 35 IAC 703.184 - Facility Location

The tank system T-17 is located in Tank Farm #4, an existing tank farm that contains 18 other tanks subject to RCRA which are approved for hazardous waste storage in the facility Part-B Permit.

Safety-Kleen Systems, Inc. Chicago Recycle Center ILD 005450697 August 1, 2007 Page 4 of 6

XII. 35 IAC 703.232 - Permits for Hazardous Waste BIFs

The Chicago Recycle Center will not be utilizing this method to manage hazardous waste on-site. Therefore, this section is not applicable to this permit modification request.

XIII. 35 IAC 724.210 - Closure Plans

A. Closure Procedures

Safety-Kleen Systems, Inc. (Safety-Kleen) will close the Chicago facility following a sequence that allows maximum flexibility while meeting all the requirements of 40 CFR 264.111, 113, 114, 178, and 197. Closure operations will involve processing of waste and intermediate product inventory and unprocessed regulated waste through the on-site processing equipment; shipment off-site of waste fuels for burning for energy recovery; decontamination of tanks, containment systems, and associated equipment; removal of residuals generated during the closure process; and certification of closure. The procedures used to carry out closure are discussed below.

The initial step of the unit closures will involve inventory removal. Any regulated waste will either be processed on-site before discharge or shipped off-site for off-site disposal at an approved waste facility in accordance with all applicable state and federal regulations. Following the removal of the inventory, decontamination of the process equipment and containment surfaces will commence. Confined space entry, if necessary and decontamination procedures are discussed in Sections 8.5 and 8.6 of the Part B Closure Plan. Decontamination wash waters and rinsates will be collected and either tested and disposed of accordingly, or assumed to be regulated and transported off-site for treatment and disposal. Any residuals generated during decontamination will be containerized disposed off-site at an approved waste management facility. The final rinseate will be sampled to determine that decontamination is complete.

Closure operations will be observed by an independent, registered professional engineer. The engineer will supply Safety-Kleen with a certification that facility closure has been conducted in accordance with the approved Closure Plan; Safety-Kleen will forward that certification to IEPA.

All procedures and regulatory requirements pertaining to the closure of these units will be in compliance with the Chicago Facility Part B Permit Closure Plan to which this document is an addendum.

Safety-Kleen Systems, Inc. Chicago Recycle Center ILD 005450697 August 1, 2007 Page 6 of 6

concentration of total organic constituents is below the level of 10 ppm (mg/l). The secondary containment will be certified by an independent, registered, professional engineer indicated that the surface has no cracks, gaps or other defects which would allow waste to migrate through to the underlying soil.

XIV. 35 IAC 724.217 - Post-closure Care

Since the tank system T-17 is not a land disposal unit, it is expected that the unit can be clean closed. Therefore, this section is not applicable.

Nowosielski, Joe

From: Nowosielski, Joe

Sent: Friday, October 12, 2007 5:33 PM

To: 'Gary Malinowski (E-mail)'

Cc: 'AAghapour@safety-kleen. com (E-mail)'

Subject: T-17 Closeout

I will attach this email to the referenced documents and give it to you. Let me know if anything else is needed for the T-17 closeout documentation.

- ★ The inventories from 09/19/04 and 09/20/04 show the tank being cleaned from PW VOC Strip LTO to MT/C
- 09/15/07 Email from Supervisor David Fandrei explaining how the washout was done for T-17.
- ★ The CRC washout report form and GC scan showing no organic contaminants on 09/20/04.
- **★** A note from me in the communicator indicating that Pedro Gonzalez had completed the washout of T-17.

"Are you in earnest? Seize this very minute! What you can do, or dream you can, begin it. Boldness has genius, power and magic in it. Only engage, and then the mind grows heated. Begin, and then the work will be completed." Johann Wolfgung von Goethe (1749 - 1832)

Joe Nowosielski Operations Manager Chicago Recycle Center 773-650-1468

CHICAGO RECYCLE CENTER DAILY TANK INVENTORY

September 20, 2004

H	F	R	TANK	CODE	MATERIAL CONTENTS	COMMENTS	HW	<6000 BTU	GALS
12		öl			DP BUFF DMAC Crude		NO		5116
F			T2		ABBL DMSO NVR Removal LTO		NO		6152
17	2	_	T3		ABBL DMSO NVR Removal LTO		NO		8417
2	2			T030	DP BUFF DMAC FP		NO		4598
10	0		T5	W001		SL GC	NO		0
10	<u></u>		T6	W001		Hatch is open	NO		0
2	1		T11	R300	SK MeCl Fractions		NO		3159
0	0		T12	W001	MT/C	Hatch Is open	NO		0
0	0	0	T13	W001	MT/C	Hatch is open	NO		0
0	0	0	T14	W001	MT/C	Hatch is open	NO		0
0	0	0	T15	W001	MT/C	Out of service !	NO		0
2	1	0	T16	R007	SK NMP B-Pass UTO	with sulfolane	NO		2190
0	0	0.	T17	W001	MT/C	的問題是一旦一時時間的	NO		0
2	2	0	T18	T025	Cel DMAC LB UTO		NO		2988
2	2	0	T19	T030	DP BUFF DMAC B-Pass UTO		NO		2010
0	0	0	T20	W001	MT/C	Top hatch is open	NO		0
0	0	0	T21	W001	MT/C		NO		0
2	1	0	T22	R007	SK NMP B-Pass UTO	from caustic treated aquired	NO		2429
0	0	0	T23	W001	MT/C	SL GC	NO		0
2	3	1	T30A		SK PGMEA Crude		YES	NO	5729
1	2	0	T30B	T046	EL DMSO Final Dehy UTO	and LTO	NO		5719
2	3	1	T31	R009	SK G THF Demethanolization LTO		NO		9376
2	3	1	T32		SK G THF HB Strip UTO		NO		14043
0	0	0	T33		PW VOC Strip LTO		NO		3088
2	3	0	T34A		MRK NEP/IAA Dehy-Split UTO		NO		6511
.2	3	0	T34B		MRK NEP B-Pass LTO		NO		2967
2	3	0	T35A		SK G MeOH FP Via ATO		NO		4164
2	3	0	T35B	T041	MRK NEP/IAA Dehy-Split UTO		NO		2426
2	3	1	T36	T038	ABBL DMSO Crude		NO		1566
2	2	0	T37A	R999	SK PGMEA LB UTO		NO		1618
2	3	1	T37B	. I	SK G THF HB Strip UTO		NO		2788
2	3	1	T38	R999	SK G THF FP		NO		4314
2	3		T39		MRK NEP Crude		YES	NO	3198
1	2		T40A		ABBL DMSO THF Strip LTO		NO		0
2					Process Water		YES	YES	6594
		0	T41A	W001	Process Water		NO		6558
2	_				MRK NEP LB Strip UTO		NO		1734
2	_		T42		SK G THF Dehy w/Hexane UTO		NO		9558
2			T43		ABBL DMSO Crude		NO		10084
2			T44		MRK NEP B-Pass UTO	ļ	NO		3550
2			T45		SK A THF (D) Self Dehy UTO	& ABBL DMSO THF STRIP UTO	NO		13430
2			T46A		SK PGMEA Crude		NO		6150
2	_	_	T46B		SK G THF Crude		NO		3203
2			T47A		PW VOC Strip UTO		NO		6253
2			T47B		SK G MeOH Hskp UTO		NO		6361
2	_		T48A		MRK NEP/IAA MeCI Strip LTO		NO	ļ	4586
3			T48B		Phosphoric Acid	ļ	NO		2614
2	_		T49A		SK G MeOH Hskp UTO	ļ	NO		6510
2	_	_	T49B		SK G THF Demethanolization LTO		NO	\ 	3732
2			T50		Waste Fuel		YES		0
2	_		T51		SK Nor THF Crude	<u> </u>	YES		13576
2			T52A		Waste Fuel		YES		5511
2					Waste Fuel	 	YES		4917
	3				SK G THF HB Strip LTO		YES	NO	5619
Ę	3			VVU01	PW VOC Strip UTO		NO	 	6591
2	1	7	T54	WANGE	SK NMP Premium FP	<u> </u>	N/A		7506

SAFETY KLEEN CORPORATION CHICAGO RECYCLE CENTER

WASHOUT REPORT

DATE: 9-20-04 OPERATOR: MATERIAL TO BE PRO	TIME: 020	1EST	
PROCESSI	EQUIPMENT:	WASHED?	GC ATTACHED
PROCESS FRACTIO	ONS / TRANSFER LINES		
MATERIAL	LINE ID		
FEED			
UTO			
LTO			
АТО			
DECANT			
	TANKS		
PROCESS WATER GE	NERATED:	0	gallons
	RATOR ERVISOR	Bala	

- 888 # - 61 | FER 15- 1981 92:13:54

START

T-17 Washaut

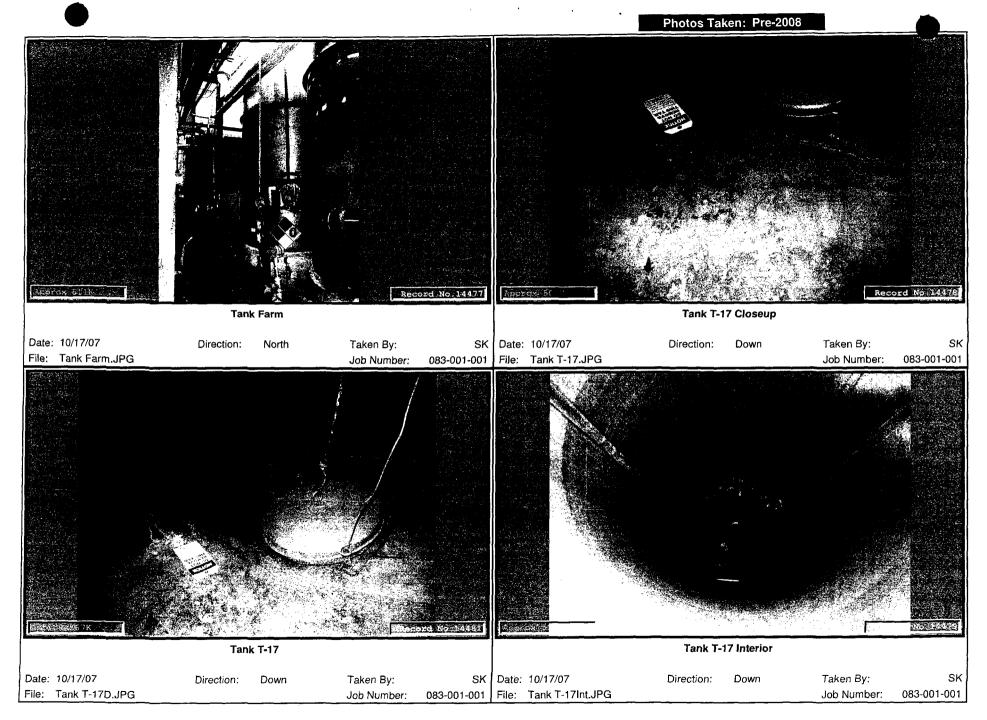
5768

RUNA 61 FEB 15: 1951 68:15:54

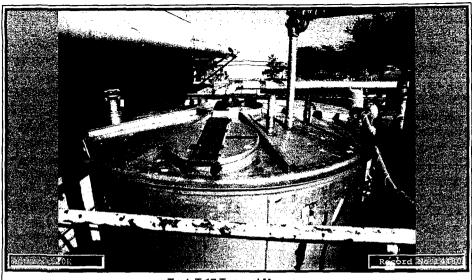
NO RHU PRANS STORED

 M_{ℓ} my intention to get to work Friday A my 6:30-7:00 Invil take care of the KPL shipping papernate, and Excelinentary Happfully this will free you up for the TPHY permits and the Calumet Festing permits We must blind off the vents an any tart in The this which a versel entry is done fere David's note 9/13/04 on page 35 Interesting day C1100 - While munt propared the FI TF#5 feed purps (dove), Muradattempted to start (1100 an MRK NOPLDStrp LTO purp would not pump regularly underlaguem, Aftersome we blew but to ade thestraines (OKd got TIME ONLY to Afternast we was much better below. C50 ps, vs 230/35) pump pressure, but there are still solid in the life, Either the next, time the LTG pumpar schodule with mint, we need to chan the LTO line ok pto the pot from the old cooler location at least Note: We need to h have at least 4, 602 ag/las "Sample in the lab of TIOS for 8 Am Mardy AM. Wowil need to plan HOLBH B Strips Tocut of C1200 - running slower than normal with better water in ted (17% to 15% for first tak). TIII is 15-20 APHB, Resuplo for Runs on day shift Friday CISO Ryaning PW: OK but could not control rether. Voc concentration to make fuel again C1400 Shutting don an Stra THF Selfkely. Ray

	1/17/08 Field Notes Jack Bedessen
	Safety-Kleen Chrago RC Tonk TIT Closure
	1445 W 52 nd Street, Chizago IL 60609
ake	Amored ousik
	Met with But Schoepke, Alfred Agapour (Freitet, Manager)
	and Cary Malinoski (EHS Manager)
	Review Closure Plan and 8/1/07 Modification and Waste
	Inspected Funk TIT - 3500 gal SS w/Cone bottom vertical AST
والمعالمة المواجعة والمعالمة المواجعة والمواجعة والمواجعة والمواجعة والمواجعة والمواجعة والمعادين والمواجعة والمواجعة	
	- Piping and apportenances disconnected, except for
Ang any grant (refuse of the least to the three three and the transfer of the least to the transfer of the least to the le	drain joiping from cone bottom
	- Both top and lower side hatcher open, so
•	interior visible
agains (in graphs) (in the feath of the fea	- In time clean with miner areas of 55 discolore tic
A	- No liquids on solids recided noted in tunk
Large de	Contracted Test America to continue semple continues
Consumination of the State of t	required he analyses - Bonnie Stadelmann 108-534-5200
ar e e e e e e e e e e e e e e e e e e e	Trepered bottle libels and COC
	SIL crew commenced finel isse of tank F-17
	Confirmed with for Nowsielski (operations Manager)
	that - fast waste solvent stored in T-17 9/19/04
	(see Daily Tank Inventory)
	- T-17 pressure was hed on 9/20/04 (5-16 excus)
anne ann de com es estado es estado estado en estado en estado en estado en estado en estado en entre en estad	- Rinsate sample collected 9/20/04 and
	analyzed by S-K lat for LC screen
والمراجعة	indirected no voletile organics
	- T-17 pressure washed again on 9/23/04
	(S-K Corew)



Photos Taken: Pre-2008



Tank T-17 Top and Manway

Date: 10/17/07

File: Tank T-17Top.JPG

Direction:

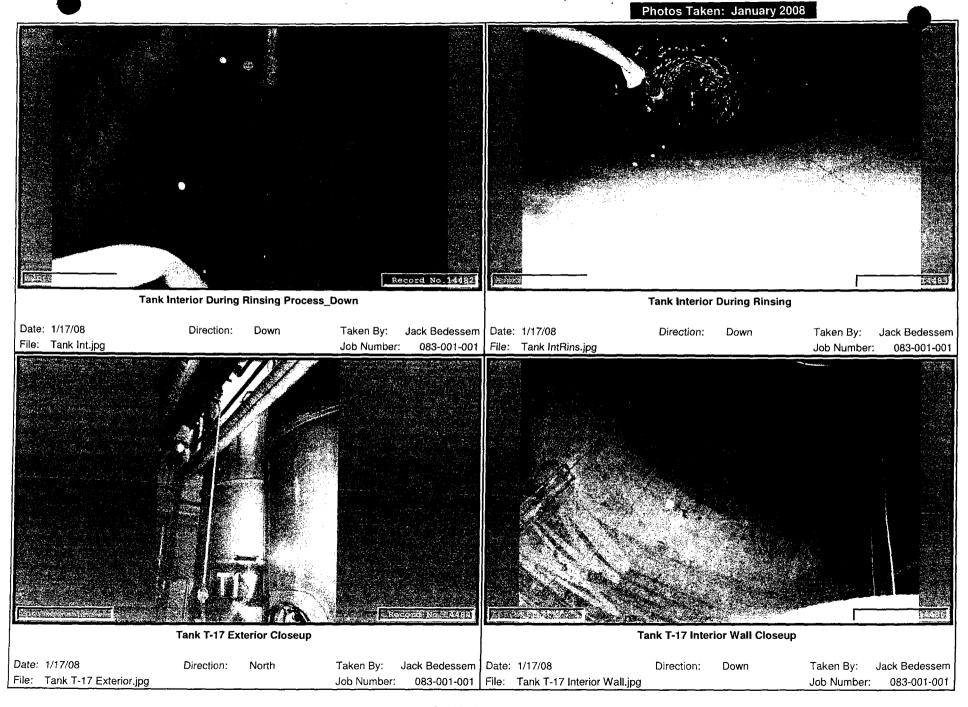
Down

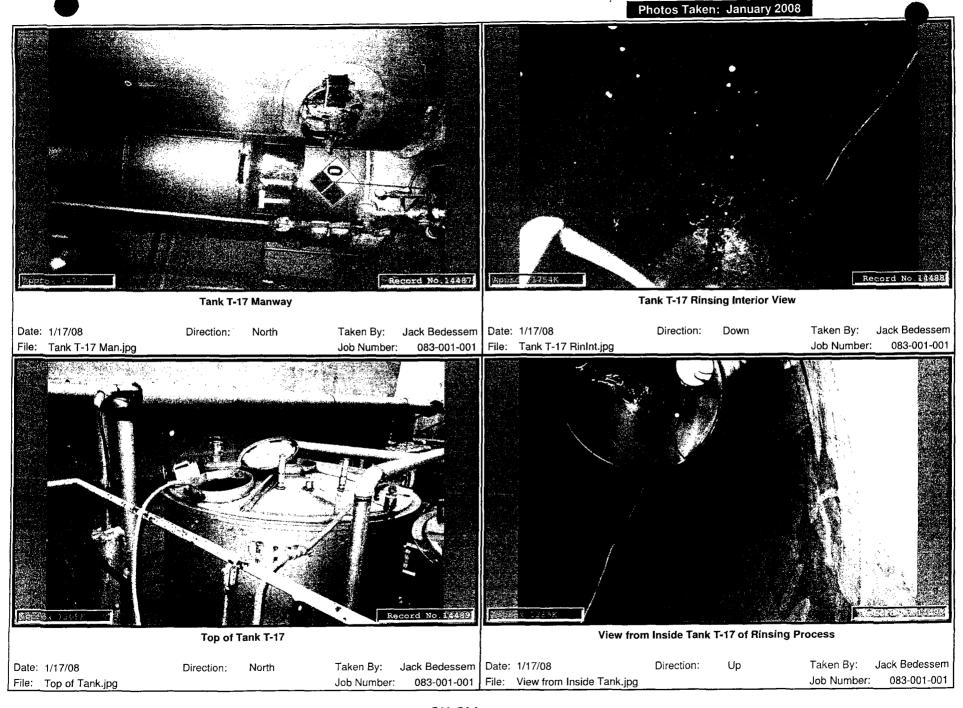
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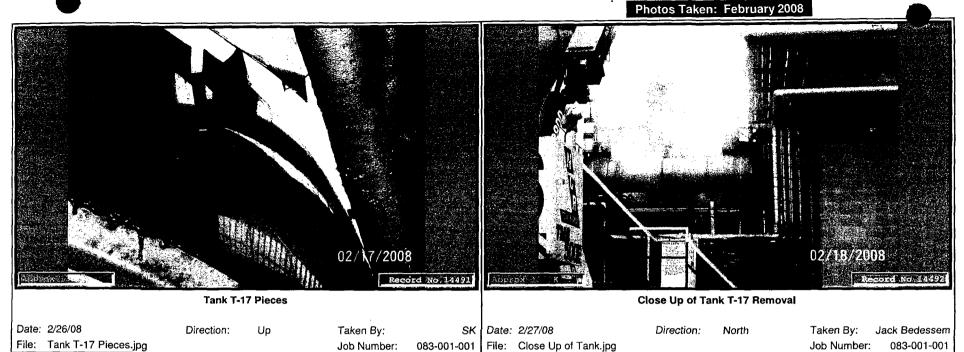
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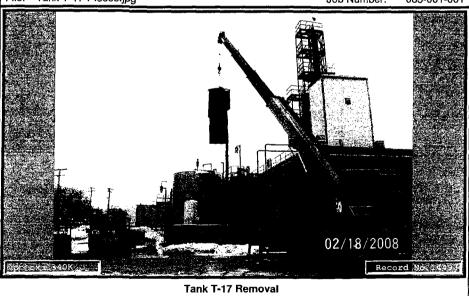
SK

Job Number: 083-001-001









North

Taken By:

Job Number:

Direction:

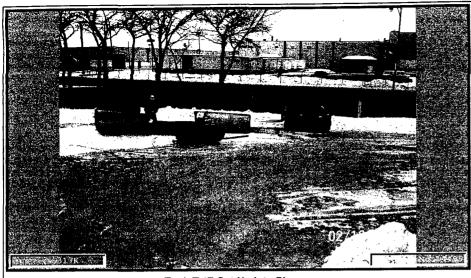
SK

083-001-001

File: Tank T-17 Removal.jpg

Date: 2/27/08

Photos Taken: March 2008



Tank T-17 Cut Up Into Pieces

Date: 3/8/08

Direction:

South

Taken By:

SK 083-001-001 Job Number:

File: Tank T-17 Cut Up.jpg

SK Chicago Photograph Archive

ATTACHMENT D

LABORATORY ANALYTICAL REPORT AND DATA VALIDATION



ANALYTICAL REPORT

Job Number: 500-8991-1

Job Description: Safety-Kleen Chicago RC T17

For:

Trihydro Corporation 1252 Commerce Drive Laramie, WY 82070

Attention: George Mathes

Bunic Stadelman

Bonnie M Stadelmann
Project Manager II
bonnie.stadelmann@testamericainc.com
01/31/2008

These test results meet all the requirements of NELAC for accredited parameters.

The Lab Certification ID# is 100201.

All questions regarding this test report should be directed to the TestAmerica Project Manager whose signature appears on this report. All pages of this report are integral parts of the analytical data. Therefore, this report should be reproduced only in its entirety.

Reporting limits are adjusted for sample size used, dilutions and moisture content if applicable.

TestAmerica Laboratories, Inc.

TestAmerica Chicago 2417 Bond Street, University Park, IL 60466 Tel (708) 534-5200 Fax (708) 534-5211 <u>www.testamericainc.com</u>



Comments

No additional comments.



All samples were received in good condition within temperature requirements.

GC/MS VOA

No analytical or quality issues were noted.

GC/MS Semi VOA

Method(s) 8270C: Surrogate recovery for the following samples were outside control limits. Evidence of matrix interference is present; therefore, re-extraction and/or re-analysis was not performed.

No other analytical or quality issues were noted.

Metals

No analytical or quality issues were noted.

Organic Prep

No analytical or quality issues were noted.

METHOD SUMMARY

Client: Trihydro Corporation

Job Number: 500-8991-1

scription	Lab Location	Method	Preparation Method
Matrix: Water			
Volatile Organic Compounds by GC/MS	TAL CHI	SW846 8260B	
Purge-and-Trap	TAL CHI		SW846 5030B
Semivolatile Compounds by Gas Chromatography/Mass Spectrometry (GC/MS)	TAL CHI	SW846 8270C	
Separatory Funnel Liquid-Liquid Extraction	TAL CHI		SW846 3510C
Inductively Coupled Plasma - Atomic Emission Spectrometry	TAL CHI	SW846 6010B	
Toxicity Characteristic Leaching Procedure	TAL CHI		SW846 1311
Acid Digestion of Aqueous Samples and Extracts for	TAL CHI		SW846 3010A
Mercury in Liquid Waste (Manual Cold Vapor Technique)	TAL CHI	SW846 7470A	
Toxicity Characteristic Leaching Procedure	TAL CHI		SW846 1311
Mercury in Liquid Waste (Manual Cold Vapor	TAL CHI		SW846 7470A

Lab References:

TAL CHI = TestAmerica Chicago

Method References:

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

SAMPLE SUMMARY

Pient: Trihydro Corporation

Job Number: 500-8991-1

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received	
500-8991-1	TAP-1	Water	01/17/2008 1100	01/17/2008 1730	
500-8991-2	FR-1	Water	01/17/2008 1100	01/17/2008 1730	
500-8991-3	TRIP BLANK	Water	01/17/2008 1100	01/17/2008 1730	

eorge Mathes hydro Corporation 1252 Commerce Drive Laramie, WY 82070

Job Number: 500-8991-1

Client Sample ID: TAP-1 Lab Sample ID: 500-8991-1 Date Sampled: 01/17/2008 1100 Date Received: 01/17/2008 1730

Analyte	Result/Qualifier	Unit	RL	Dilution
Method: 8260B		Date Analyzed:	01/22/2008 2359	
Prep Method: 5030B		Date Prepared:	01/22/2008 2359	
1,1,1,2-Tetrachloroethane	ND	ug/L	1.0	1.0
1,1,1-Trichloroethane	ND	ug/L	1.0	1.0
1,1,2,2-Tetrachloroethane	ND	ug/L	1.0	1.0
1,1,2-Trichloroethane	ND	ug/L	1.0	1.0
1,1-Dichloroethane	ND	ug/L	1.0	1.0
1,1-Dichloroethene	ND	ug/L	1.0	1.0
1,1-Dichloropropene	ND	ug/L	1.0	1.0
1,2,3-Trichlorobenzene	ND	ug/L	1.0	1.0
1,2,3-Trichloropropane	ND	ug/L	1.0	1.0
1,2,4-Trimethylbenzene	ND	ug/L	1.0	1.0
1,2-Dibromo-3-Chloropropane	ND	ug/L	2.0	1.0
1,2-Dibromoethane	ND	ug/L	1.0	1.0
1,2-Dichloroethane	ND	ug/L	1.0	1.0
1,2-Dichloropropane	ND	ug/L	1.0	1.0
1,3,5-Trimethylbenzene	ND	ug/L	1.0	1.0
1,3-Dichloropropane	ND	ug/L	1.0	1.0
2,2-Dichloropropane	ND	ug/L	1.0	1.0
2-Chlorotoluene	ND	ug/L	1.0	1.0
2-Hexanone	ND	ug/L	5.0	1.0
4-Chlorotoluene	ND	ug/L	1.0	1.0
Acetone	ND	ug/L	5.0	1.0
Benzene	ND	ug/L	1.0	1.0
Bromobenzene	ND	ug/L	1.0	1.0
Bromochloromethane	ND	ug/L	1.0	1.0
Bromodichloromethane	3.3	ug/L	1.0	1.0
Bromoform	ND	ug/L	1.0	1.0
Bromomethane	ND	ug/L	1.0	1.0
Carbon disulfide	ND	ug/L	5.0	1.0
Carbon tetrachloride	ND	ug/L	1.0	1.0
Chlorobenzene	ND	ug/L	1.0	1.0
Chloroethane	ND	ug/L	1.0	1.0
Chloroform	2.8	ug/L	1.0	1,0
Chloromethane	ND	ug/L	1.0	1.0
cis-1,2-Dichloroethene	ND	ug/L	1.0	1.0
cis-1,3-Dichloropropene	ND	ug/L	1.0	1.0
Dibromochloromethane	2.5	ug/L	1.0	1.0
Dibromomethane	ND	ug/L	1.0	1.0
Dichlorodifluoromethane	ND	ug/L	1.0	1.0
Ethylbenzene	ND	ug/L	1.0	1.0

Progression Mathes hydro Corporation 1252 Commerce Drive Laramie, WY 82070

Job Number: 500-8991-1

Client Sample ID: TAP-1 Lab Sample ID: 500-8991-1

Date Sampled: 01/17/2008 1100 Date Received: 01/17/2008 1730

Analyte	Result/Qualifier	Unit	RL	Dilution
2-Chlorophenol	ND	ug/L	5.0	1.0
2-Methylnaphthalene	ND	ug/L	0.50	1.0
2-Nitroaniline	ND	ug/L	5.0	1.0
2-Nitrophenol	ND	ug/L	10	1.0
3,3'-Dichlorobenzidine	ND *	ug/L	5.0	1.0
3-Nitroaniline	ND	ug/L	10	1.0
4,6-Dinitro-2-methylphenol	ND	ug/L	20	1.0
4-Bromophenyl phenyl ether	ND	ug/L	5.0	1.0
4-Chloro-3-methylphenol	ND	ug/L	10	1.0
4-Chloroaniline	ND	ug/L	10	1.0
4-Chlorophenyl phenyl ether	ND	ug/L	5.0	1.0
4-Nitroaniline	ND	ug/L	10	1.0
4-Nitrophenol	ND	ug/L	20	1.0
Acenaphthene	ND	ug/L	1.0	1.0
Acenaphthylene	ND	ug/L	1.0	1.0
Anthracene	ND	ug/L	1.0	1.0
Benzidine	ND *	ug/L	40	1.0
Benzo[a]anthracene	ND	ug/L	0.20	1.0
Benzo[a]pyrene	ND	ug/L	0.20	1.0
Benzo[b]fluoranthene	ND	ug/L	0.20	
Benzo[g,h,i]perylene	ND	ug/L	1.0	1.0 1.0
Benzo[k]fluoranthene	ND	ug/L	0.20	
Benzoic acid	ND *	ug/L	20	1.0
Benzyl alcohol	ND	ug/L	20	1.0
Bis(2-chloroethoxy)methane	ND	ug/L	2.0	1.0
Bis(2-chloroethyl)ether	ND	ug/L	2.0	1.0
Bis(2-ethylhexyl) phthalate	ND	ug/L	10	1.0
Butyl benzyl phthalate	ND	ug/L	2.0	1.0
Carbazole	ND	ug/L	5.0	1.0
Chrysene	ND	ug/L	0.50	1.0
Dibenz(a,h)anthracene	ND	ug/L	0.30	1.0
Dibenzofuran	ND	ug/L	2.0	1.0
Diethyl phthalate	ND	ug/L	2.0	1.0
Dimethyl phthalate	ND	ug/L	2.0	1.0
Di-n-butyl phthalate	ND	ug/L		1.0
Di-n-octyl phthalate	ND	ug/L	5.0 10	1.0
Fluoranthene	ND	ug/L ug/L		1.0
Fluorene	ND	ug/L	1.0	1.0
Hexachloro-1,3-butadiene	ND	ug/L	1.0	1.0
Hexachlorobenzene	ND	ug/L ug/L	5.0	1.0
Hexachlorocyclopentadiene	ND *		0.50	1.0
	NO	ug/L	20	1.0

hydro Corporation 1252 Commerce Drive Laramie, WY 82070

Job Number: 500-8991-1

Client Sample ID: FR-1 Lab Sample ID: 500-8991-2 Date Sampled: 01/17/2008 1100 Date Received: 01/17/2008 1730

Analyte	Result/Qualifier	Unit	RL	Dilution
Method: 8260B		Date Analyzed:	01/23/2008 0022	
Prep Method: 5030B		Date Prepared:	01/23/2008 0022	
1,1,1,2-Tetrachloroethane	ND	ug/L	1.0	1.0
1,1,1-Trichloroethane	ND	ug/L	1.0	1.0
1,1,2,2-Tetrachloroethane	ND	ug/L	1.0	1.0
1,1,2-Trichloroethane	ND	ug/L	1.0	1.0
1,1-Dichloroethane	ND	ug/L	1.0	1.0
1,1-Dichloroethene	ND	ug/L	1.0	1.0
1,1-Dichloropropene	ND	ug/L	1.0	1.0
1,2,3-Trichlorobenzene	ND	ug/L	1.0	1.0
1,2,3-Trichloropropane	ND	ug/L	1.0	1.0
1,2,4-Trimethylbenzene	ND	ug/L	1.0	1.0
1,2-Dibromo-3-Chloropropane	ND	ug/L	2.0	1.0
1,2-Dibromoethane	ND	ug/L	1.0	1.0
1,2-Dichloroethane	ND	ug/L	1.0	1.0
1,2-Dichloropropane	ND	ug/L	1.0	1.0
1,3,5-Trimethylbenzene	ND	ug/L	1.0	1.0
1,3-Dichloropropane	ND	ug/L	1.0	1.0
2,2-Dichloropropane	ND	ug/L	1.0	1.0
2-Chlorotoluene	ND	ug/L	1.0	1.0
2-Hexanone	ND	ug/L	5.0	1.0
4-Chlorotoluene	ND	ug/L	1.0	1.0
Acetone	ND	ug/L	5.0	1.0
Benzene	ND	ug/L	1.0	1.0
Bromobenzene	ND	ug/L	1.0	1.0
Bromochloromethane	ND	ug/L	1.0	1.0
Bromodichloromethane	2.5	ug/L	1.0	1.0
Bromoform	ND	ug/L	1.0	1.0
Bromomethane	ND	ug/L	1.0	1.0
Carbon disulfide	ND	ug/L	5.0	1.0
Carbon tetrachloride	ND	ug/L	1.0	1.0
Chlorobenzene	ND	ug/L	1.0	1.0
Chloroethane	ND	ug/L	1.0	1.0
Chloroform	2.0	ug/L	1.0	1.0
Chloromethane	ND	ug/L	1.0	1.0
cis-1,2-Dichloroethene	ND	ug/L	1.0	1.0
cis-1,3-Dichloropropene	ND	ug/L	1.0	1.0
Dibromochloromethane	2.0	ug/L	1.0	1.0
Dibromomethane	ND	ug/L	1.0	1.0
Dichlorodifluoromethane	ND	ug/L	1.0	
Ethylbenzene	ND	ug/L	1.0	1.0 1.0

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Job Number: 500-8991-1

Client Sample ID: FR-1 Lab Sample ID: 500-8991-2

Date Sampled: 01/17/2008 1100 Date Received: 01/17/2008 1730

Analyte	Result/Qualifier	Unit	RL	Dilution
2-Chlorophenol	ND	ug/L	5.2	1.0
2-Methylnaphthalene	ND	ug/L	0.52	1.0
2-Nitroaniline	ND	ug/L	5.2	1.0
2-Nitrophenol	ND	ug/L	10	1.0
3,3'-Dichlorobenzidine	ND *	ug/L	5.2	1.0
3-Nitroaniline	ND	ug/L	10	1.0
4,6-Dinitro-2-methylphenol	ND	ug/L	21	1.0
4-Bromophenyl phenyl ether	ND	ug/L	5.2	1.0
4-Chloro-3-methylphenol	ND	ug/L	10	1.0
4-Chloroaniline	ND	ug/L	10	1.0
4-Chlorophenyl phenyl ether	ND	ug/L	5.2	
4-Nitroaniline	ND	ug/L	10	1.0
4-Nitrophenol	ND	ug/L	21	1.0
Acenaphthene	ND	ug/L		1.0
Acenaphthylene	ND	ug/L ug/L	1.0	1.0
Anthracene	ND	ug/L	1.0	1.0
Benzidine	ND *	ug/L ug/L	1.0	1.0
Benzo[a]anthracene	ND	-	41	1.0
Benzo(a)pyrene	ND	ug/L	0.21	1.0
Benzo[b]fluoranthene	ND	ug/L	0.21	1.0
Benzo[g,h,i]perylene	ND	ug/L	0.21	1.0
Benzo[k]fluoranthene	ND	ug/L	1.0	1.0
Benzoic acid	ND *	ug/L	0.21	1.0
Benzyl alcohol	ND	ug/L	21	1.0
Bis(2-chloroethoxy)methane		ug/L 	21	1.0
Bis(2-chloroethyl)ether	ND	ug/L	2.1	1.0
Bis(2-ethylhexyl) phthalate	ND	ug/L	2.1	1.0
Butyl benzyl phthalate	ND	ug/L 	10	1.0
Carbazole	ND	ug/L	2.1	1.0
Chrysene	ND	ug/L	5.2	1.0
Dibenz(a,h)anthracene	ND	ug/L	0.52	1.0
• • •	ND	ug/L	0.31	1.0
Dibenzofuran	ND	ug/L	2.1	1.0
Diethyl phthalate	ND	ug/L	2.1	1.0
Dimethyl phthalate	ND	ug/L	2.1	1.0
Di-n-butyl phthalate	ND	ug/L	5.2	1.0
Di-n-octyl phthalate	ND	ug/L	10	1.0
Fluoranthene	ND	ug/L	1.0	1.0
Fluorene	ND	ug/L	1.0	1.0
Hexachloro-1,3-butadiene	ND	ug/L	5.2	1.0
Hexachlorobenzene	ND	ug/L	0.52	1.0
Hexachlorocyclopentadiene	ND *	ug/L	21	1.0

orge Mathes
Trihydro Corporation
1252 Commerce Drive
Laramie, WY 82070

Job Number: 500-8991-1

Client Sample ID: TRIP BLANK Lab Sample ID: 500-8991-3

Date Sampled: 01/17/2008 1100 Date Received: 01/17/2008 1730

Analyte	Result/Qualifier	Unit	RL	Dilution
Method: 8260B		Date Analyzed:	01/23/2008 0045	
Prep Method: 5030B		Date Prepared:	01/23/2008 0045	
Dichlorodifluoromethane	ND	ug/L	1.0	1.0
Chloromethane	ND	ug/L	1.0	1.0
Vinyl chloride	ND	ug/L	1.0	1.0
Bromomethane	ND	ug/L	1.0	1.0
Chloroethane	ND	ug/L	1.0	1.0
Trichlorofluoromethane	ND	ug/L	1.0	1.0
1,1-Dichloroethene	ND	ug/L	1.0	1.0
Carbon disulfide	ND	ug/L	5.0	1.0
Acetone	ND	ug/L	5.0	1.0
Methylene Chloride	ND	ug/L	2.0	1.0
trans-1,2-Dichloroethene	ND	ug/L	1.0	1.0
Methyl tert-butyl ether	ND	ug/L	1.0	1.0
1,1-Dichloroethane	ND	ug/L	1.0	1.0
2,2-Dichloropropane	ND	ug/L	1.0	1.0
cis-1,2-Dichloroethene	ND	ug/L	1.0	1.0
Methyl Ethyl Ketone	ND	ug/L	5.0	1.0
Bromochloromethane	ND	ug/L	1.0	1.0
Chloroform	ND	ug/L	1.0	1.0
1,1,1-Trichloroethane	ND	ug/L	1.0	1.0
1,1-Dichloropropene	ND	ug/L	1.0	1.0
Carbon tetrachloride	ND	ug/L	1.0	1.0
Benzene	ND	ug/L	1.0	1.0
1,2-Dichloroethane	ND	ug/L	1.0	1.0
Trichloroethene	ND	ug/L	1.0	1.0
1,2-Dichloropropane	ND	ug/L	1.0	1.0
Dibromomethane	ND	ug/L	1.0	1.0
Bromodichloromethane	ND	ug/L	1.0	1.0
cis-1,3-Dichloropropene	ND	ug/L	1.0	1.0
methyl isobutyl ketone	ND	ug/L	5.0	1.0
Toluene	ND	ug/L	1.0	1.0
trans-1,3-Dichloropropene	ND	ug/L	1.0	1.0
1,1,2-Trichloroethane	ND	ug/L	1.0	1.0
Tetrachloroethene	ND	ug/L	1.0	1.0
1,3-Dichloropropane	ND	ug/L	1.0	1.0
2-Hexanone	ND	ug/L	5.0	1.0
Dibromochloromethane	ND	ug/L	1.0	1.0
1,2-Dibromoethane	ND	ug/L	1.0	
Chlorobenzene	ND	ug/L	1.0	1.0 1.0
1,1,1,2-Tetrachloroethane	ND	ug/L	1.0	1.0

DATA REPORTING QUALIFIERS



nt: Trihydro Corporation

Job Number: 500-8991-1

Lab Section	Qualifier	Description
GC/MS Semi VOA		
	*	RPD of the LCS and LCSD exceeds the control limits
	×	Surrogate exceeds the control limits



nt: Trihydro Corporation

Job Number: 500-8991-1

QC Association Summary

Lab Sample ID	Client Sample ID	Report Basis	Client Matrix	Method	Prep Batch
GC/MS VOA					
Analysis Batch:500-30636	5				
LCS 500-30636/5	Lab Control Spike	Т	Water	8260B	
MB 500-30636/4	Method Blank	Т	Water	8260B	
500-8991-1	TAP-1	T	Water	8260B	
500-8991-2	FR-1	T	Water	8260B	
500-8991-3	TRIP BLANK	Т	Water	8260B	
Report Basis T = Total					
GC/MS Semi VOA					
Prep Batch: 500-30386					
LCS 500-30386/2-A	Lab Control Spike	Т	Water	3510C	
LCSD 500-30386/3-A	Lab Control Spike Duplicate	Т	Water	3510C	
MB 500-30386/1-A	Method Blank	Т	Water	3510C	
500-8991-1	TAP-1	Ţ	Water	3510C	
500-8991-2	FR-1	Т	Water	3510C	
Analysis Batch:500-3083		-		00700	
LCS 500-30386/2-A	Lab Control Spike	T ~	Water	8270C	500-30386
MB 500-30386/1-A	Method Blank	Т	Water	8270C	500-30386
Analysis Batch:500-3102		_			
LCSD 500-30386/3-A	Lab Control Spike Duplicate	Т	Water	8270C	500-30386
Analysis Batch:500-3122		-	147-4	00700	Ban 2
500-8991-1	TAP-1	Ţ	Water	8270C	500-30386
500-8991-2	FR-1	T	Water	8270C	500-30386

Report Basis

T = Total

Client: Trihydro Corporation

Job Number: 500-8991-1



8260B Volatile Organic Compounds by GC/MS

Lab Sample ID	Client Sample ID	12DCE %Rec	TOL %Rec	BFB %Rec	DBFM %Rec
500-8991-1	TAP-1	105	84	91	100
500-8991-2	FR-1	103	93	93	100
500-8991-3	TRIP BLANK	106	95	90	101
MB 500-30636/4		102	94	94	103
LCS 500-30636/5		98	97	99	98

Surrogate	Acceptance Limits	
12DCE = 1,2-Dichloroethane-d4 (Surr)	70-125	
TOL = Toluene-d8 (Surr)	75-120	
BFB = 4-Bromofluorobenzene (Surr)	75-120	
DBFM = Dibromofluoromethane	75-120	

Quality Control Results

Client: Trihydro Corporation Job Number: 500-8991-1

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Method Blank - Batch: 500-30636

Method: 8260B Preparation: 5030B

Lab Sample ID: MB 500-30636/4

Client Matrix: Water Dilution: 1.0

Date Analyzed: 01/22/2008 1753 Date Prepared: 01/22/2008 1753 Analysis Batch: 500-30636

Prep Batch: N/A Units: ug/L

Instrument ID: Agilent 6890N GC - 5973N

Lab File ID: 6M0122.D
Initial Weight/Volume: 10 mL
Final Weight/Volume: 10 mL

Analyte	Result	Qual	RL
1,1-Dichloroethene	ND	menental energia ya interiori ya Mari wa Mari wa Mari wa Mari wa 1904	1.0
1,1-Dichloroethane	ND		1.0
2,2-Dichloropropane	ND		1.0
1,1,1-Trichloroethane	ND		1.0
1,1-Dichloropropene	ND		1.0
Acetone	ND		5.0
Benzene	ND		1.0
1,2-Dichloroethane	ND		1.0
Bromochloromethane	ND		1.0
1,2-Dichloropropane	ND		1.0
Bromodichloromethane	ND		1.0
Bromomethane	ND		1.0
Carbon disulfide	ND		5.0
Carbon tetrachloride	ND		1.0
Chloroethane	ND		1.0
1,1,2-Trichloroethane	ND		1.0
Chloroform	ND		1.0
Chloromethane	ND		1.0
1,3-Dichloropropane	ND		1.0
cis-1,2-Dichloroethene	ND		1.0
2-Hexanone	ND		5.0
cis-1,3-Dichloropropene	ND		1.0
Dibromochloromethane	ND		1.0
1,2-Dibromoethane	ND		1.0
Dibromomethane	ND		1.0
Chlorobenzene	ND		1.0
Dichlorodifluoromethane	ND		1.0
1,1,1,2-Tetrachloroethane	ND		1.0
Ethylbenzene	ND		1.0
m&p-Xylene	ND		2.0
Methyl Ethyl Ketone	ND		5.0
methyl isobutyl ketone	ND		5.0
Bromoform	ND		1.0
Methyl tert-butyl ether	ND		1.0
Isopropylbenzene	ND		1.0
Methylene Chloride	ND		2.0
Bromobenzene	ND		1.0
1,1,2,2-Tetrachloroethane	ND		1.0
1,2,3-Trichloropropane	ND		1.0
o-Xylene	ND		1.0
N-Propylbenzene	ND		1.0

Calculations are performed before rounding to avoid round-off errors in calculated results.

Job Number: 500-8991-1

Client: Trihydro Corporation



Lab Control Spike - Batch: 500-30636

Method: 8260B Preparation: 5030B

Lab Sample ID: LCS 500-30636/5

Client Matrix: Dilution:

Water 1.0

Date Analyzed: 01/22/2008 1816 Date Prepared: 01/22/2008 1816 Analysis Batch: 500-30636

Prep Batch: N/A

Units: ug/L

Instrument ID: Agilent 6890N GC - 5973N

Lab File ID: 6S0122.D Initial Weight/Volume: 10 mL Final Weight/Volume: 10 mL

Analyte	Spike Amount	Result	% Rec.	Limit	Qual
1,1-Dichloroethene	25.0	24.1	96	50 - 121	and the second contract of the second of the
1,1-Dichloroethane	25.0	22.1	89	63 - 121	
2,2-Dichloropropane	25.0	21.8	87	56 - 134	
1,1,1-Trichloroethane	25.0	23.8	95	65 - 129	
1,1-Dichloropropene	25.0	23.8	95	62 - 122	
Acetone	25.0	19.8	79	22 - 175	
Benzene	25.0	22.5	90	68 - 120	
1,2-Dichloroethane	25.0	23.1	92	68 - 120	
Bromochloromethane	25.0	25.8	103	61 - 125	
1,2-Dichloropropane	25.0	23.4	94	72 - 120	
Bromodichloromethane	25.0	25.1	100	71 - 131	
Bromomethane	25.0	30.1	120	61 - 172	
Carbon disulfide	25.0	22.5	90	33 - 120	
Carbon tetrachloride	25.0	25.1	101	67 - 121	
Chloroethane	25.0	28.4	114	56 - 152	
1,1,2-Trichloroethane	25.0	24.1	96	59 - 135	
Chloroform	25.0	23.1	92	65 - 127	
Chloromethane	25.0	18.5	74	50 - 140	
1,3-Dichloropropane	25.0	23.9	95	73 - 120	
cis-1,2-Dichloroethene	25.0	23.9	96	62 - 127	
2-Hexanone	25.0	21.1	84	54 - 139	
cis-1,3-Dichloropropene	26.9	22.1	82	60 - 120	
Dibromochloromethane	25.0	23.0	92	57 - 132	
1,2-Dibromoethane	25.0	24.8	99	68 - 125	
Dibromomethane	25.0	23.4	93	71 - 120	
Chlorobenzene	25.0	22.9	91	75 - 120	
Dichlorodifluoromethane	25.0	18.1	72	21 - 178	
1,1,1,2-Tetrachloroethane	25.0	25.0	100	72 - 120	
Ethylbenzene	25.0	24.3	97	75 - 120	
m&p-Xylene	50.0	49.5	99	75 - 120	
Methyl Ethyl Ketone	25.0	27.9	112	36 - 157	
methyl isobutyl ketone	25.0	23.0	92	65 - 128	
Bromoform	25.0	22.7	91	55 - 120	
Methyl tert-butyl ether	25.0	24.0	96	54 - 140	
Isopropylbenzene	25.0	22.0	88	68 - 120	
Methylene Chloride	25.0	22.9	92	52 - 126	
Bromobenzene	25.0	23.8	95	76 - 120	
1,1,2,2-Tetrachloroethane	25.0	24.1	97	68 - 120	
1,2,3-Trichloropropane	25.0	23.7	95	70 - 120	
o-Xylene	25.0	25.3	101	75 - 120	
N-Propylbenzene	25.0	22.5	90	74 - 120	

Client: Trihydro Corporation Job Number: 500-8991-1

4

Method Blank - Batch: 500-30386

Method: 8270C Preparation: 3510C

Lab Sample ID: MB 500-30386/1-A

Client Matrix: Water Dilution: 1.0

Date Analyzed: 01/25/2008 1939 Date Prepared: 01/21/2008 0555 Analysis Batch: 500-30839 Prep Batch: 500-30386

Units: ug/L

Instrument ID: Agilent 6890N GC - 5973N

Lab File ID: 30386M.D
Initial Weight/Volume: 1000 mL
Final Weight/Volume: 1.0 mL
Injection Volume: 1 uL

Analyte	Result	Qual	RL
1,2,4-Trichlorobenzene	ND	and the following is the first of the contraction o	2.0
1,2-Dichlorobenzene	ND		2.0
1,3-Dichlorobenzene	ND		2.0
1,4-Dichlorobenzene	ND		2.0
2,2'-oxybis[1-chloropropane]	ND		2.0
2,4,5-Trichlorophenol	ND		10
2,4,6-Trichlorophenol	ND		5.0
2,4-Dichlorophenol	ND		10
2,4-Dimethylphenol	ND		10
2,4-Dinitrophenol	ND		20
2,4-Dinitrotoluene	ND		1.0
2,6-Dinitrotoluene	ND		0.50
2-Chloronaphthalene	ND		2.0
2-Chlorophenol	ND		5.0
2-Methylnaphthalene	ND		0.50
2-Nitroaniline	ND		5.0
2-Nitrophenol	ND		10
3,3'-Dichlorobenzidine	ND		5.0
3-Nitroaniline	ND		10
4,6-Dinitro-2-methylphenol	ND		20
4-Bromophenyl phenyl ether	ND		5.0
4-Chloro-3-methylphenol	ND		10
4-Chloroaniline	ND		10
4-Chlorophenyl phenyl ether	ND		5.0
4-Nitroaniline	ND		10
4-Nitrophenol	ND		20
Acenaphthene	ND		1.0
Acenaphthylene	ND		1.0
Anthracene	ND		1.0
Benzidine	ND		40
Benzo[a]anthracene	ND		0.20
Benzo[a]pyrene	ND		0.20
Benzo[b]fluoranthene	ND		0.20
Benzo[g,h,i]perylene	ND		1.0
Benzo[k]fluoranthene	ND		0.20
Benzoic acid	ND		20
Benzyl alcohol	ND		20
Bis(2-chloroethoxy)methane	ND		2.0
Bis(2-chloroethyl)ether	ND		2.0
Bis(2-ethylhexyl) phthalate	ND		10
Butyl benzyl phthalate	ND		2.0

Client: Trihydro Corporation

Job Number: 500-8991-1

Lab Control Spike/

Lab Control Spike Duplicate Recovery Report - Batch: 500-30386

Method: 8270C Preparation: 3510C

LCS Lab Sample ID: LCS 500-30386/2-A

Client Matrix:

Water

Dilution: Date Analyzed:

Date Prepared:

01/25/2008 2241

01/21/2008 0555

Analysis Batch: 500-30839

Prep Batch: 500-30386

Units: ug/L

Instrument ID: Agilent 6890N GC - 5973N

Lab File ID:

30386BS.D

Initial Weight/Volume: Final Weight/Volume:

1000 mL

1.0 mL

Injection Volume:

1 uL

LCSD Lab Sample ID: LCSD 500-30386/3-A

Client Matrix:

Water

Dilution:

1.0

Date Analyzed: Date Prepared: 01/28/2008 1658 01/21/2008 0555 Analysis Batch: 500-31021 Prep Batch: 500-30386

Units: ug/L

Instrument ID: Agilent 6890N GC - 59731

Lab File ID: 30386BD.D

Initial Weight/Volume: 1000 mL

Final Weight/Volume: 1.0 mL

Injection Volume:

	<u>%</u>	<u>Rec.</u>					
Analyte	LCS	LCSD	Limit	RPD	RPD Limit	LCS Qual	LCSD Qual
1,2,4-Trichlorobenzene	87	89	41 - 110	2	20	*** * do ******* **** ******** **** ***	to the history with the the section of the section
1,2-Dichlorobenzene	90	93	41 - 110	3	20		
1,3-Dichlorobenzene	87	90	37 - 110	3	20		
1,4-Dichlorobenzene	86	90	39 - 110	5	20		
2,2'-oxybis[1-chloropropane]	79	80	47 - 111	1	20		
2,4,5-Trichlorophenol	102	96	63 - 118	5	20		
2,4,6-Trichlorophenol	95	97	58 - 116	2	20		
2,4-Dichlorophenol	95	95	58 - 110	1	20		
2,4-Dimethylphenol	86	86	20 - 135	0	20		
2,4-Dinitrophenol	108	117	24 - 147	8	20		
2,4-Dinitrotoluene	104	99	64 - 119	5	20		
2,6-Dinitrotoluene	99	98	64 - 119	1	20		
2-Chloronaphthalene	89	90	53 - 110	2	20		
2-Chlorophenol	94	97	55 - 110	4	20		
2-Methylnaphthalene	87	88	48 - 110	2	20		
2-Nitroaniline	96	93	53 - 125	2	20		
2-Nitrophenol	106	110	60 - 112	3	20		
3,3'-Dichlorobenzidine	96	77	45 - 124	22	20		*
3-Nitroaniline	113	99	59 - 126	13	20		
4,6-Dinitro-2-methylphenol	99	108	52 - 127	9	20		
4-Bromophenyl phenyl ether	98	98	61 - 116	0	20		
4-Chloro-3-methylphenol	88	88	57 - 110	0	20		
4-Chloroaniline	102	86	49 - 117	17	20		
4-Chlorophenyl phenyl ether	86	86	62 - 111	0	20		
4-Nitroaniline	104	96	48 - 125	7	20		
4-Nitrophenol	53	47	20 - 110	12	20		
Acenaphthene	87	91	54 - 110	5	20		
Acenaphthylene	86	87	56 - 110	1	20		
Anthracene	89	89	57 - 110	Ò	20		
Benzidine	74	24	5 - 142	101	20		*
Benzo[a]anthracene	83	79	55 - 112	5	20		
Benzo[a]pyrene	108	106	48 - 112	1	20		

Job Number: 500-8991-1 Client: Trihydro Corporation

Lab Control Spike/ Lab Control Spike Duplicate Recovery Report - Batch: 500-30386 Method: 8270C Preparation: 3510C

LCS Lab Sample ID: LCS 500-30386/2-A

Client Matrix:

Dilution:

Water 1.0

Date Analyzed:

01/25/2008 2241

Date Prepared:

01/21/2008 0555

Analysis Batch: 500-30839

Prep Batch: 500-30386 Units: ug/L

Initial Weight/Volume: Final Weight/Volume:

Instrument ID: Agilent 6890N GC - 5973N 30386BS.D

Lab File ID:

1000 mL 1.0 mL

Injection Volume: 1 uL

LCSD Lab Sample ID: LCSD 500-30386/3-A

Client Matrix:

Water

Dilution:

1.0

Date Analyzed: Date Prepared: 01/28/2008 1658 01/21/2008 0555 Analysis Batch: 500-31021 Prep Batch: 500-30386

Units: ug/L

Instrument ID: Agilent 6890N GC - 5973

Lab File ID: 30386BD.D

Initial Weight/Volume: 1000 mL Final Weight/Volume: 1.0 mL Injection Volume: 1 uL

A control of	_	6 Rec.	l imais	DDD	DDD 1 imili	1.00.0	10000
Analyte	LCS	LCSD	Limit	RPD	RPD LIMIT	LCS Quai	LCSD Qual
Benzo[b]fluoranthene	107	109	46 - 122	2	20		Marie Commerce Address Springers Commerce Commer
Benzo[g,h,i]perylene	113	117	47 - 121	4	20		
Benzo[k]fluoranthene	105	95	42 - 120	10	20		
Benzoic acid	22	30	10 - 110	32	20		*
Benzyl alcohol	88	93	46 - 110	6	20		
Bis(2-chloroethoxy)methane	92	94	59 - 110	2	20		
Bis(2-chloroethyl)ether	87	85	55 - 110	2	20		
Bis(2-ethylhexyl) phthalate	97	89	60 - 121	9	20		
Butyl benzyl phthalate	92	88	63 - 115	4	20		
Carbazole	96	94	59 - 114	2	20		
Chrysene	80	76	53 - 121	6	20		
Dibenz(a,h)anthracene	113	116	48 - 117	3	20		
Dibenzofuran	85	86	60 - 110	1	20		
Diethyl phthalate	88	86	67 - 110	2	20		
Dimethyl phthalate	89	88	67 - 110	1	20		
Di-n-butyl phthalate	91	91	65 - 115	0	20		
Di-n-octyl phthalate	116	114	52 - 123	2	20		
Fluoranthene	86	86	61 - 110	0	20		
Fluorene	84	84	57 - 110	0	20		
Hexachloro-1,3-butadiene	89	91	34 - 110	2	20		
Hexachlorobenzene	98	96	57 - 116	1	20		
Hexachlorocyclopentadiene	63	79	18 - 110	23	20		*
Hexachloroethane	89	91	34 - 110	2	20		
Indeno[1,2,3-cd]pyrene	109	112	43 - 119	3	20		
Isophorone	81	83	59 - 110	2	20		
m & p - Cresol	88	87	35 - 110	2	20		
Naphthalene	84	85	48 - 110	1	20		
Nitrobenzene	94	96	54 - 111	2	20		
N-Nitrosodi-n-propylamine	90	91	50 - 110	1	20		
N-Nitrosodiphenylamine	96	95	58 - 110	0	20		
o-Cresol	86	89	39 - 110	4	20		
Pentachlorophenol	90	90	32 - 124	0	20		

Client: Trihydro Corporation

Job Number: 500-8991-1

Neutral Leach or MeOH Extraction Blank - Batch: 500-30490

Method: 6010B Preparation: 3010A

TCLP

Lab Sample ID: LB3 500-30437/1-C

Analysis Batch: 500-30570

Instrument ID: TJA ICAP 61E Trace Analy

Client Matrix: Water

Prep Batch: 500-30490

Lab File ID: P50122B

Dilution:

1.0

Units: mg/L

Date Analyzed: 01/22/2008 1715

Initial Weight/Volume: 50 mL

Date Prepared: 01/22/2008 0855

Final Weight/Volume: 50 mL

Date Leached: 01/21/2008 1443

Leachate Batch: 500-30437

Analyte	Result	Qual	RL
Arsenic	ND		0.050
Barium	ND		0.50
Cadmium	ND		0.0050
Chromium	ND		0.025
Lead	ND		0.0075
Selenium	ND		0.050
Silver	ND		0.025

Lab Control Spike - Batch: 500-30490

Method: 6010B Preparation: 3010A

Lab Sample ID: LCS 500-30490/4-A

Client Matrix: Water

Dilution: 1.0

Date Analyzed: 01/22/2008 1755 Date Prepared: 01/22/2008 0855 Analysis Batch: 500-30570 Prep Batch: 500-30490

Units: mg/L

Instrument ID: TJA ICAP 61E Trace Analy

Lab File ID: P50122B

Initial Weight/Volume: 50 mL

Final Weight/Volume: 50 mL

Analyte	Spike Amount	Result	% Rec.	Limit	Qual
Arsenic	0.100	0.0954	95	80 - 120	en with the or thrown, party and the case of
Barium	2.00	1.95	97	80 - 120	
Cadmium	0.0500	0.0478	96	80 - 120	
Chromium	0.200	0.199	99	80 - 120	
Lead	0.100	0.0985	98	80 - 120	
Selenium	0.100	0.0898	90	80 - 120	
Silver	0.0500	0.0502	100	80 - 120	

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Client: Safety-Kleen	Laboratory: Test America - University Park	
Project Name: Chicago Recycle Center Closure	Sample Matrix: Water	
Project Number: 083-001-001	Sample Start Date: January 17, 2008	
Date Validated: February 6, 2008	Sample End Date: January 17, 2008	

Samples Analyzed: TAP-1, FR-1, and Trip Blank

Parameters: Method 8260B for VOCs, Method 8270C for SVOCs, Method 6010B TCLP, and Method 7470A for Mercury

Laboratory Project ID: 500-8991

Data Validator: Christina Hiegel, Civil Engineer, E.I.T.

Precision, Accuracy, Method Compliance, Completeness Assessment

Precision Acceptable

Comments: Precision is the measure of variability of sample measurements. Field precision is determined by a comparison of field duplicate sample results. Laboratory precision is determined by examining the laboratory duplicate results. Evaluation of both the field and laboratory duplicates for precision was accomplished using the relative percent difference (RPD). The RPD is defined as the difference between the primary and duplicate samples divided by the mean and expressed as a percentage. No laboratory duplicates were collected during this sampling event. Laboratory precision was evaluated by checking the LCS/LCSD results. The constituents 3,3-dichlorobenzidine (22%), benzidene (101%), benzoic acid (32%), and hexachlorocyclopentadiene (23%) were recovered above the upper RPD limit of 20%. As a result of this occurrence, all associated data points were qualified.

Accuracy Acceptable

Comments: Accuracy is a measure of sampling and analysis bias. Field accuracy is determined by collecting field, trip and equipment blanks to monitor for possible ambient or cross contamination during sampling. One trip blank was collected and no detections were reported in the trip blank.

Laboratory accuracy is measured by evaluating laboratory control sample (LCS) and matrix spike/matrix spike duplicate (MS/MSD) recoveries. No MS/MSD recoveries were reported with this data set. However, LCS and LCSD recoveries were compared to laboratory control limits. All LCS/LCSD recoveries were acceptable; however, some RPDs between the LCS and LCSD were above the upper limit of 20% as noted above.

Method Compliance

Comments: Method compliance was determined by reviewing the holding times, detection limits, surrogate recoveries, method blanks, and laboratory control samples against method specific requirements. The surrogate phenol-d5 was recovered below the acceptable lower limits in samples TAP-1 and FR-1. No data were qualified as a result of this occurrence as discussed in Section #18.

Acceptable

Completeness Acceptable

Comments: Completeness is the overall ratio of the number of samples planned versus the number of samples with valid analyses. Determination of completeness included a review of the chain-of-custody and laboratory analytical methods. Completeness also includes a review of the analytical reports and QC summary report. All data were presented in a clear and complete manner. No data were qualified or rejected; therefore, these data sets are 100% complete.



Were the instrument calibrations within method control limits?	Yes
Comments: There were no instrument calibration results noted in the data sets associated wit nowever, it is assumed that all results were acceptable based on other QC data.	th the water samples;
12. Were method blank samples analyzed on a 5% basis?	Yes
Comments: Method blank samples were analyzed on a 5% basis for all analyses.	
13. Were method blank detections reported for this data set?	No
Comments: There were no detections reported in the method blanks.	
14. Were matrix spike samples prepared on a 5% basis?	No
Comments: No matrix spike samples were included with this data report.	
15. Were matrix spike recoveries within acceptable limits?	N/A
Comments: N/A	· · · · · · · · · · · · · · · · · · ·
16. Were laboratory control samples analyzed on a 5% basis?	Yes
Comments: Laboratory control samples were collected on a 5% basis for all analyses.	
17. Were laboratory control recoveries within acceptable limits? Comments: Laboratory control samples RPDs were outside of acceptable limits for several of Method 8270C. The RPD for 3,3-dichlorobenzidine (22%), benzidene (101%), benzoic acid (3 hexachlorocyclopentadiene (23%) were above the upper RPD limit of 20%. As a result, all as qualified "J" since the high RPD indicates poor repeatability in the laboratory.	32%), and ssociated results will be
18. Were surrogate recoveries within control limits?	No
Comments: Surrogate recoveries were acceptable with the following exceptions. For SVOCs surrogate recovery for phenol-d5 (1%; acceptable range 10-115%) was below the acceptable Additionally, for SVOCs and sample FR-1, the surrogate recovery for phenol-d5 (5%; acceptate was below the acceptable recovery limits. The laboratory reported that these occurrences we within the sample. No data were qualified since only one of the six surrogates was out of range recovery was due to interferences within the sample.	e recovery limits. able recovery 10-115%) are due to interferences
19. Were equipment blanks and field blanks collected on a 10% basis?	Yes
Comments: One trip blank (Trip Blank) was collected during this sampling event.	
20. Were detections found in trip blanks, equipment blanks, or field blanks?	No
Comments: No constituents were detected in the trip blank.	
21. Were field duplicates collected on a 10% basis? Comments: No field duplicates were collected as part of this sampling event.	No
22. Were field duplicate RPD values less than 30%?	N/A
Comments: N/A	
23. General Comments: Data were presented in a clear and complete manner. No data we therefore these data sets are 100% complete.	ere qualified or rejected;





CERTIFICATE OF DESTRUCTION

DRIVER'S TICKET # 37540

In consideration of the transfer to United Scrap Metal Inc, of the property covered by referenced Sales Agreement, a value based upon its being used as Scrap, the undersigned represents and warrants that all material identified as Safety-Kleen designated as "Tank T-17" (Material Requiring Destruction), and all components thereof purchased under current contract between Safety-Kleen and United Scrap Metal Inc., shall be rendered unusable.

This destruction activity is hereby witnessed by Tony Siebert on said date at the United Scrap Metal. Inc. facility located at 1545 South Cicero Avenue, Cicero, Illinois, 60804. All materials will be either be destroyed on-site at United Scrap Metal or shipped directly to a designated mill or foundry for direct shredding and/or remelt.

Any unauthorized access to the container/s designated as "Tank T-17" (Material Requiring Destruction) during transportation and/or storage from Safety-Kleen to the United Scrap Metal Inc. facility was reported to Frank Ortega within 48 hours of the occurrence.

Safety-Kleen Representative

United Scrap Metal Representative

Date 3/10/08

Driver's Ticket #37540

CERTIFICATION STATEMENT SAFETY-KLEEN SYSTEMS, INC. **CLEAN HARBORS ENVIRONMENTAL SERVICES** TANK T-17 CLOSURE CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Alfred Aghapou

5/1/08 Date

Clean Harbors Environmental Services

Chicago Recycle Center - Facility Manager

Trihydro Corporation

Illinois Professional Engineer (No. 062049091)



325 WOOD ROAD, P.O. BOX 327 • BRAINTREE, MA 02184 (617) 849-1800

Via Federal Express

November 13, 1995

Mr. Edwin C. Bakowski, P.E. Manager, Permit Section Bureau of Land State of Illinois Environmental Protection Agency 2200 Churchill Road Springfield, Illinois 62794-9276

Re: Clean Harbors of Chicago, Inc. Response to Comments

Closure Documentation Report

Dear Mr. Bakowski:

Clean Harbors of Chicago, Inc. (CHCI) is pleased to submit this package in response to your letter dated September 28, 1995 regarding the Agency's review of the June 29, 1995 report entitled "Closure Documentation Report for Decontamination/Closure Activities at CWM Chemical Services, Inc." (hereafter referred to as the CDR).

CHCI has prepared a comment-by-comment response following the same order used in your September 28th letter. The response is provided in the attached Exhibit 1. Three (3) copies of Exhibit 1 are provided for your convenience.

Please note that by cover letter October 27, 1995, CHCI submitted to IEPA and U.S. EPA an Addendum Report which describes the closure/decontamination of last two outdoor container storage areas and provides other follow-up information (e.g., shipping documents) for closure/decontamination activities which occurred after the date of the original CDR.



Mr. Edwin Bakowski, P.E./IEPA November 13, 1995 Page 2

If you have any additional questions, please feel free to contact me at (617) 849-1800, extension 4473.

Sincerely,

Paul A. Ahearn

Manager, Regulatory Compliance

Enclosure

cc: George Hamper, U.S. EPA Region V RCRA Branch Anton Martig, U.S. EPA Region V TSCA Branch Brian Clarke, CWM Chemical Services, Inc. James Laubsted, CHCI

Exhibit 1

Clean Harbors of Chicago, Inc. Response to IEPA Comments Closure Documentation Report

November 13, 1995

- 1. Bulk Storage Tank T-108: No response required.
- 2. Bulk Storage Tank T-111:
 - a. The procedures used to prepare tank T-111 for off-site transport and disposal

Response:

The decontamination of Tank T-111 proved unsuccessful after repeated wash/scrub rounds with diesel fuel and degreasing agents. As a result, CHCI made the decision to dispose of the tank as a RCRA/waste, and the tank was then drained of all free liquid and wiped down to a dry condition. The tank was removed from the tank farm using a crane on December 8, 1994. On December 17, 1994 the tank was cut up and placed in two rolloff containers in preparation for offsite shipment.

b. The facility where tank T-111 was disposed; and

Response:

The tank was cut up, placed in rolloffs, and shipped to CWM Chemical Services, Inc. in Emelle, Alabama for macroencapsulation and disposal as a RCRA/TSCA waste.

c. The waste manifest numbers and copies of the waste manifests from the disposal of tank T-111.

Response:

CHCI notes that disposal information was not maintained on a piece-by-piece basis. Rather, materials/articles of similar composition and contamination that were intended for the same treatment/disposal method were assigned a unique profile number. Outbound manifests of TSCA/RCRA waste were then tracked by profile number.

For example, as shown in Exhibit 1 of Closure Documentation Report dated 6/23/95, the unique profile number assigned to RCRA/TSCA debris intended for RCRA macroencapsulation and RCRA/TSCA landfill is "BS0455". disposal at a accompanying spreadsheet of outbound shipments includes a profile number for each outbound manifest. Copies of the manifest and land disposal restriction forms accompanied each shipment were included by chronological order in Volumes 1-4 of the CDR. Thus, the dismantled Tank T-111 would have been assigned to profile number BS0455. Shipment information, including manifest number, for waste meeting profile number BS0455 are itemized on pages 6 and 7 of Exhibit 1 of the CDR.

- 3. Bulk Storage Tank Farm Piping, Pumps, and Ancillary Equipment:
 - a. How the equipment was decontaminated, if at all:

Response:

All tank farm piping, pumps, and ancillary equipment was drained of all free liquid, dismantled, and placed into rolloff containers for offsite disposal.

b. What cleanup levels were obtained if the equipment was decontaminated;

Response:

CHCI opted to dispose of the equipment, rather than to undertake a decontamination and sampling program.

c. If, where, and when the equipment was disposed, recycled, or reused; and

Response:

All of the dismantled equipment was placed into rolloff containers and shipped to CWM Chemical Services, Inc. in Emelle, Alabama for macroencapsulation and disposal as a RCRA/TSCA waste.

d. Documentation of the final fate of the equipment (i.e., receipts, manifests, salvage tickets, etc.).

Response:

Refer to Exhibit 1, profile number BS0455.

- 4. Building 43 Primary Shredder: No response required.
- 5. Building 43 Drum Crusher: No response required.
- 6. Building 26 Secondary Shredder:
 - a. The procedures used to prepare the Building 16 Secondary Shredder for off-site transport and disposal;

Response:

The secondary shredder (a TSCA/RCRA unit) was TSCA decontaminated in accordance with a sampling and decontamination plan approved by U.S. EPA Region V in preparation for onsite re-use in CHCI hazardous waste fuel blending system. RCRA decontamination was not required since the unit was intended to remain in RCRA service.

- U.S. EPA regulations for decontamination of PCB items other than tanks and containers require the use of an EPA-permitted decontamination procedure/contractor. Thus, the original decontamination procedures proposed for the shredder by CHCI were not approved by EPA Region V. As a result, CHCI subsequently retained the services of Vector Group, Inc. of Cincinnati, Ohio to prepare a unit-specific decontamination plan under their nationwide TSCA decontamination approval. Vector's decontamination plan for the primary and secondary shredders, the drum crushing unit, and portable pumps and other used during PCB decontamination procedures, was reviewed and approved by U.S. EPA personnel in Washington, D.C. headquarters and Region V. Vector's decontamination procedures and results are described in their May 1995 Final Report which was included as part of CHCI's 6/23/95 CDR.
- b. The facility where the Building 26 Secondary Shredder was disposed; and

Response:

As noted above, the decontaminated secondary shredder was not disposed; rather it was incorporated into the design of the CHCI hazardous waste fuel blending system.

c. The waste manifest numbers and copies of the waste manifests from the disposal of the Building 26 Secondary Shredder.

Response:

Not applicable since the device remained onsite and is in use in the CHCI fuel blending system.

- 7. Ancillary Equipment Associated with Items 4 through 6 (I.E., Building 43 Primary Drum Shredder, Building 43 Drum Crusher Unit, and Building 26 Secondary Shredder)
 - a. The procedures used to prepare the ancillary equipment for off-site transport and disposal;

Response:

All of the ancillary equipment (e.g., pipes, pumps, etc.) associated with the Building 43 Primary Drum Shredder, Building 43 Drum Crusher Unit, and Building 26 Secondary Shredder was drained of all free liquid and then shipped as a TSCA or RCRA/TSCA for disposal.

b. The facility where the ancillary equipment was disposed; and

Response:

All of the ancillary equipment was shipped for RCRA/TSCA disposal at CWM Chemical Services, Inc. in Emelle, Alabama or Model City, New York..

c. The waste manifest numbers and copies of the waste manifests from the disposal of the ancillary equipment

Response:

Refer to Exhibit 1, profile number BS0455.

- 8. Building 26 Roller Conveyer Unit/Conveyer Between Buildings 26 & 43
 - a. How the Building 26 Roller Conveyer Unit was decontaminated, if at all;

Response:

The roller conveyer inside Building 26 was not decontaminated. Rather, it was dismantled and placed into rolloff containers for offsite disposal.

b. The cleanup levels that were obtained if the equipment was decontaminated;

Response:

Not Applicable.

c. If, where, and when the equipment was disposed, recycled, or reused;

Response:

The roller conveyer was shipped to CWM Chemical Services, Inc. in Emelle, Alabama or Model City, New York for macroencapsulation and disposal as a RCRA/TSCA waste.

d. Documentation of the final fate of the equipment (i.e., receipts, manifests, salvage tickets, etc.).

Response:

Refer to Exhibit 1, profile number BS0455.

e. If the Building 26 Roller Conveyer unit is the Conveyer Between Buildings 26 and 43; and

Response:

There was, in fact, a separate roller conveyer which connected Buildings 26 and 43.

f. If the Building 26 Roller Conveyer Unit and the Conveyer Between Buildings 26 and 43 are not the same units, then information required in Items a. through d. above should be provided for the Conveyer Between Buildings 26 and 43.

Response:

The Building 26-to-43 conveyer was managed in exactly the same manner as the Building 26 conveyer. That is, the Building 26-to-43 conveyer was dismantled without prior decontamination, placed into a rolloff container, and then shipped to CWM Chemical Services, Inc. in Emelle, Alabama or Model City, New York for macroencapsulation and disposal as a RCRA/TSCA waste.

- 9. Bulk Storage Tanks T-101 through T-107, T-109, T-110 and T-112: No response required.
- 10. The Tank Farm Secondary Containment Structure:
 - a. Locations where buried drums were found;

Response:

The buried drums were found approximately at a depth of approximately 3-6 feet below grade in an area at the southwest corner of the new Tank Farm control room.

b. When the drums were found

Response:

The drums were found during excavation activities for the new control room/pump house during the week of April 16-22, 1995.

The number and types of drums found at each location;

Response:

By best estimate, there were approximately six (6) or eight (8) 55-gallon steel drums and drum fragments found in the excavation. The severe extent of fragmentation made it difficult to determine the exact number of drums

d. The condition of the drums;

Response:

The drums appeared to have been emptied and then crushed prior to land disposal. Most of the drums experienced severe rusting, leaving pieces/fragments of drums.

e. The content of the drums;

Response:

Based on visual inspections of the containers and the surrounding soil, it appears as though the drums were empty, crushed, and then filled over with soil/backfill. The type of soil/backfill surrounding the drums was generally consistent with the backfill found in other excavation holes around the facility, and there was no unusual discoloration or obvious liquid/sludge layers or pockets in or around the drums. Air monitoring conducted in and around the excavation did not detect any unusual organic compounds.

f. How the drums were prepared for disposal and where they were disposed; and

Response:

The drums/fragments and surrounding soils were placed into two (2) 85-gallon overpack containers and two (2) 1-cubic yard boxes.

g. The waste manifest numbers and copies of the waste manifests from the disposal of the drums.

Response:

The drums were shipped to CWM Chemical Services in Port Arthur Texas for RCRA incineration. As shown on Page 9 of Exhibit 3 of the CDR Addendum Report dated 10/6/95, the drums/excavation materials were assigned profile number BQ9781 and shipped on manifest no. TX00907427.

- 11. Building 25: No response required.
- 12. Building 26: No response required.
- 13. Building 43: No response required.
- 14. The Old CWM Ash Pad (Area 38):
 - a. How the Ash Pad was decontaminated; and

Response:

The Ash Pad was a concrete pad used as a 90-day generator area for bins of RCRA/TSCA ash produced by the former rotary kiln incinerator. The Ash Pad was operated as a 90-day RCRA generator area, not as a permitted RCRA storage unit; therefore RCRA closure did not apply. However, since TSCA-regulated wastes were accumulated there, CHCI performed a PCB decontamination in accordance with procedures used for other concrete surfaces at the site.

Specifically, the Ash Pad was swept to remove all sand/grit/debris, and then scrubbed down with AMAX degreasing solution. Twenty-two (22) grid samples were collected and seven (7) exceeded the decontamination standard of 10 ppm PCB's. As a result, a second round of cleaning/scrubbing with AMAX degreaser was conducted, and new grid samples were collected. All of the remaining grid points achieved the less than 10 ppm PCB threshold. Analytical results for the Ash Pad and the locations of the PCB grid sampling points were previously provided in Exhibits 5 and 8 of the CDR.

b. What the intended use of the Ash Pad will be.

Response:

Following successful TSCA decontamination, the Ash Pad was covered over with clean fill and an asphalt topcoat as part of the construction of the new roadway system which connects the former CWM site with the existing CHCI site.

- 15. Area 13, the Rail Car Unloading Area: No response required.
- 16. Area 14, the Truck Scale: No response required.
- 17. Area 59, the Truck Staging Area: No response required.
- 18. Area 60, the Roll-Off Pad for Fuels Blending: No response required.
- 19. Areas 61/62, the Container Handling Dock/Truck Pad: No response required.